

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

ACCESS 4 ALL, INC., a Not-for-Profit
Corporation, and FELIX ESPOSITO,
Individually,

Plaintiffs,

v.

DELANCEY CLINTON ASSOCIATES, L.P., a
Pennsylvania Limited Partnership,

Defendant.

Case No.: 04-cv-12347

**MOTION TO ALLOW PLAINTIFF'S
COUNSEL TO APPEAR
TELEPHONICALLY AT THE
SCHEDULING CONFERENCE**

COME NOW, the undersigned attorneys for the Plaintiffs, and respectfully move this Court pursuant to Local Rule 40.3(a) for good cause to allow Plaintiffs' counsel to appear telephonically at the scheduling conference, or in the alternative, and as grounds thereof state the following:

1. The undersigned attorney is licenced to practice law in the United States District Court for the District of Massachusetts. The two attorneys who will be working with the undersigned attorney are John P. Fuller and Tracie L. Dickerson.

2. Both Tracie L. Dickerson, and Mr. John P. Fuller, are filing along with this motion, their applications to be admitted pro hac vice in this case.

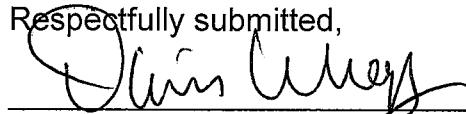
3. It would be great expense for Ms. Dickerson or Mr. Fuller to fly to Boston for the scheduling conference currently set for July 20, 2005, and the undersigned attorney is not available on said date.

4. The parties have filed a proposed Joint Statement, and therefore the need for the in person attendance is greatly diminished.

CERTIFICATE OF CONFERENCE

Counsel for defendant has assented to the foregoing motion.

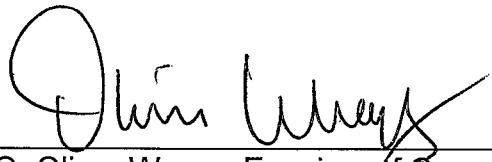
Respectfully submitted,



O. Oliver Wragg, Esquire, *of Counsel*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been furnished to Michael Colgan Harrington, Esq.; MURTHA CULLINA, LLP; 185 Asylum Street, CityPlace I, Hartford, CT 06103; via U.S. Mail on this 9th day of July 2005.



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